

From: Joseph Eller
To: Jay Hudson; jjmetts@santeecooper.com
CC: Liz Basil; Myra C. Reece; Rhonda Banks Thompson; Veronica Barringer
Date: 9/4/08 5:09 PM
Subject: Additional Information Request for Pee Dee 112(g) Application Review

Jay and Julie,

This email is a follow-up to our last meeting discussing the Pee Dee 112(g) MACT application in which we identified some questions that you could help answer. Subsequent to that meeting, we have identified further questions that we are also requesting your input.

During our recent meeting (August 25) discussing the Pee Dee 112(g) MACT application, DHEC identified the following two items that Santee Cooper/Trinity indicated further input could be provided to assist with our analysis.

1. The Prong 1 calculation approach used by Santee Cooper for sources where a correlation equation was not developed used stack tests average emissions, stack test results standard deviation, and a t-statistic. For sources where EPA had developed a correlation equation, the Prong 1 approach replicated the EPA approach. Please calculate a variation to your Prong 1 calculations for those sources having a correlation equation, but using the "no correlation equation" approach based on stack tests average emissions, stack test results standard deviation, and a t-statistic. These calculations then provide a "hybrid" Prong 1 approach with emissions for all sources based on the same methodology.
2. Provide a Flow Diagram for each approach (EPA, Prong 1, and Prong 2) that explains what, and how, information is used at each decision point and allows comparison of similarities and differences of the approaches.

In addition, the report for the Cross Generating Station Mercury CEMS Data Analysis described Prong 1 and Prong 2 emissions for each of the Cross units based on adjusted CEMS results. However, the calculations were not included explaining how those emissions were developed. Please provide the calculations showing how the emissions for Prong 1 and Prong 2 were arrived at.

Finally, our efforts to re-create EPA's calculations for sources outside the top performing 4 sources identified by EPA results in questions about why some of the other sources were not among the top 4 sources. Please provide calculations using the EPA methodology for sources in your Variability Analysis that were not in EPA's top performing sources, i.e., SEI Birchwood, Intermountain, Logan, Salem Harbor, and Clover).

If any of these questions need further clarification, just let me know. Please submit responses to these questions as soon as possible.

Thanks,
Joe

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